

UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Competitive Product Prices
Priority Mail Express International,
Priority Mail International, First-Class Package
International Service & Commercial ePacket
Contract 8 (MC2020-218)
Negotiated Service Agreements

Docket No. CP2020-246

PUBLIC REPRESENTATIVE COMMENTS ON
NOTICE OF POSTAL SERVICE FILING MODIFICATION TWO TO
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL
INTERNATIONAL, FIRST-CLASS PACKAGE INTERNATIONAL SERVICE
& COMMERCIAL ePACKET CONTRACT 8

(May 24, 2022)

The Public Representative hereby provides comments pursuant to the Commission's Notice in this docket.¹ In that Order, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of Filing of Modification Two to Priority Mail Express International, Priority Mail International, First-Class Package International Service and Commercial ePacket Contract 8.²

¹ Notice Initiating Docket(s) for Recent Postal Service Negotiated Service Agreement Filings, May 17, 2022 (Notice).

² Notice of the United States Postal Service of Filing Modification Two to Priority Mail Express International, Priority Mail International, First-Class Package International Service & Commercial ePacket Contract 8. May 16, 2022. (Request).

The Postal Service's Notice includes a certified statement as required by 39 C.F.R. § 3035.105(c)(2), a public (redacted) version of Modification Two to Contract 8, and supporting financial data estimating the contract value during the first year.

In Order No. 5651, the Commission approved the Postal Service's request to add a new product identified as Priority Mail Express International, Priority Mail International, First-Class Package International Service and Commercial ePacket Contract 8 to the Competitive Product List.³ The instant Modification revises Articles 2, 3, 8, 10, 11, and 14 of the Agreement, changes Article 11 so that the Agreement will remain in effect until May 31, 2023, and adds Annexes 1B, 2B, 3B, 1C, 2C, 3C, 4B, and 5B to the agreement. *Request* at 1.

COMMENTS

The Public Representative has reviewed the Postal Service's Notice of Modification Two to Priority Mail Express International, Priority Mail International, First-Class Package International Service and Commercial ePacket Contract 8 and the financial data filed under seal with the Postal Service's Notice. Based upon that review, the Public Representative concludes that Contract 8, as modified, should continue to generate sufficient revenues to cover costs and thereby satisfy 39 U.S.C. § 3633(a) and thus should be approved by the Commission.

Additionally, the Postal Service must file revenue and cost data for Contract 8 in future Annual Compliance Reports. This data will permit the Commission to annually review the financial results for Contract 8 to ensure continued compliance with 39 U.S.C. § 3633(a).

³ See Order No. 5651 Order Adding Priority Mail Express International, Priority Mail International, First-Class Package International Service & Commercial ePacket Contract 8 to the Competitive Product List, Docket No. MC2020-218 and CP2020-246, August 21, 2020.

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

Katalin K. Clendenin
Public Representative

901 New York Ave. NW
Washington, DC 20268-0001
202-789-6860
katalin.clendenin@prc.gov